

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**The Use of N11 Codes and Other
Abbreviated Dialing Arrangements**

CC Docket No. 92-105

COMMENTS OF MCI, INC.

MCI, Inc. (“MCI”) hereby submits its comments in response to the Commission’s Notice of Proposed Rulemaking concerning various abbreviated dialing arrangements that could be used by state “One Call” notification systems in compliance with the Pipeline Safety Improvement Act of 2002 (the Pipeline Safety Act).¹ The Commission seeks comments on whether an N11 code or another three-digit number should be assigned to comply with the Pipeline Safety Act. The Commission also seeks comment on implementation issues such as the integration of existing One Call Center numbers and an appropriate implementation timeframe for each proposed abbreviated dialing arrangement.

MCI urges the Commission to assign an N11 code – in this case, 811 – to comply with the Pipeline Safety Act. Assignment of 811 is the most reasonable measure that the Commission can use to accomplish its goals with the least impact on numbering optimization.

¹ *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, Notice of Proposed Rulemaking, CC Docket No. 92-105 (rel. May 14, 2004).

I. Use of 811 Would Have the Least Impact on Number Optimization

The use of 811 to comply with the Pipeline Safety Act would consume fewer numbering resources than the use of 344, which the Department of Transportation (DOT) requests.² MCI agrees with the Commission's tentative conclusion that because 344 corresponds to an Easily Recognizable Codes (ERC), an abbreviated dialing code in the form of an ERC or other area code would be inconsistent with the Commission's numbering resource optimization policies³. As the Commission correctly observes, the establishment of 344 as an abbreviated dialing code would result in the removal of eight million telephone numbers from future use.⁴ Consequently, as NANC recognizes, MCI and other companies would have to implement an inter-digit timing mechanism in areas where there is still seven-digit dialing and the NXX 344 has been assigned.⁵ In addition, customer confusion over 344 time-out dialing issues, where calls complete to end users rather than the One Call Center, would likely ensue, as the Commission notes that NANC has raised the NPRM.⁶

II. 811 Should be Implemented Just Like Other N11 Codes.

In implementing 811, the Commission should follow the same guidelines as any other N11 code. Moreover, in order to reduce the impact on telephone networks, 811 should not have a lengthy implementation period. MCI recommends the Commission fully implement 811 no more than one year after 811 has been designated. Companies that use 811 for other purposes should be required to clear their code use before any DIG

² See NPRM at ¶ 17-18.

³ NPRM at ¶ 18.

⁴ *Id.*

⁵ *Id.* at ¶ 19.

⁶ *Id.*

implementation can occur. Simultaneously, states should be required to collect information and details on their One Call jurisdictions so that that information can be distributed and 811 mapped according to the location and the center using existing toll-free numbers.

III. Conclusion

For the foregoing reasons, MCI urges the Commission to assign 811 to comply with the Pipeline Safety Act, consistent with the above comments.

Respectfully submitted,
MCI, Inc.

/S/

Karen M. Johnson
MCI, INC.
1133 Nineteenth St., N.W.
Washington, D.C. 20036
(202) 736-6453

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